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MEMO ENDORSED

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May 14, 2021

VIA ECF
Honorable Judge Kenneth M. Karas
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

> Re: **United States v. Samuel Turner**
> **21-cr-00291-KMK**

Dear Honorable Judge Karas:

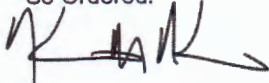Mr. Turner and the Government have reached a resolution in this matter.

Mr. Turner is anxious to enter a change of plea and move on with his life. He looks forward to being designated to a facility that would afford him the opportunity to learn salable skills. Unfortunately, Westchester Correctional Facility does not afford him that opportunity. Specifically, Mr. Turner is seeking to obtain salable skills in HVAC and/or CDL. He needs a certain amount of time to complete the training. Delaying his change of plea hearing significantly impacts the time he is ultimately designated and as a result, impacts the amount of time in which he can receive training by BOP. Thus, he waives his right to be physically present before Your Honor for a change of plea hearing and respectfully asks to be allowed to enter a change of plea remotely (via telephone, video or both). Given Mr. Turner's goals, further delay would result in an injustice.

Therefore, we respectfully request that the matter be scheduled for May 18, 2021 for a remote plea hearing. Please know that the Government consents to our request.

Thank you in advance for your consideration.

The Court finds that delaying the change of plea proceeding in this case would risk serious harm to the interests of justice under the CARES Act, for the reasons noted herein. The plea may go forward on May 18, 2021.

So Ordered.

5/14/21

Very truly yours,

/s/ *Deveraux L Cannick*
Deveraux L. Cannick

DLC/ad

Cc: AUSA Steven Kochevar, via email